

Fitzgerald & Associates, PC  
Nicholas Fitzgerald Esq. NF/6129  
649 Newark Avenue  
Jersey City, NJ 07306-2303  
(201) 533-1100  
Email: nickfitz.law@gmail.com  
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY -- NEWARK

-----X  
In re:

**Chapter 13**

Jeisson Zambrano,  
  
Debtor

Case No.25-14304-JKS

Conf. Hearing Date: 7/10/25  
Time: 8:30 a.m.

-----X

**ATTORNEY'S RESPONSE TO SECURED CREDITOR'S [VEHICLE LENDER'S]  
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

I, Nicholas Fitzgerald, the above named debtor's counsel, hereby responds to the debtor's vehicle lender's objection to the confirmation of the debtor's payment plan as follows:

The debtor had proposed a modified plan to surrender the debtor's vehicle in full satisfaction of the amount owed on the vehicle. The debtor's vehicle lender has objected to confirmation of the debtor's payment plan on the grounds that there will ultimately be an unsecured deficiency as to the vehicle.

It is the debtor's intention to later modify the debtor's payment plan to accommodate this deficiency claim.

Dated: June 23, 2025

  
\_\_\_\_\_  
Nicholas Fitzgerald  
Debtor's Counsel

**Exhibit** -- Copy of Objection to Confirmation

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Courtney R Shed, Esq. - 414442023 GROSS POLOWY LLC Formed in the State of Delaware 95 Mount Bethel Road, Suite 3 Warren, NJ 07059 (716) 204-1700 E-mail: cshed@grosspolowy.com Attorneys for Secured Creditor TD Bank, N.A.	
In Re:	Case No.: 25-14304-jks
JEISSON ZAMBRANO	Hearing Date: July 24, 2025
Debtor(s).	Chapter: 13
	Judge: John K. Sherwood

**OBJECTION TO MODIFIED PLAN FILED JUNE 11, 2025**

TD Bank, N.A., by its counsel, Gross Polowy LLC, as and for an Objection to Confirmation of the Debtor's Chapter 13 Modified Plan filed June 11, 2025, states the following grounds:

1. On April 25, 2025, the debtor, above-named, filed a voluntary petition in bankruptcy under Title 11, Chapter 13, U.S.C., United States Bankruptcy Court for the District of New Jersey.
2. The Court has jurisdiction to entertain this objection under 28 U.S.C., Section 157.
3. TD Bank, N.A., is the holder of a properly perfected first-in-right purchase money security interest in one (1) 2020 Kia Stinger (V.I.N. KNAE15LA7L6075877) owned by and, upon information and belief, in the possession and control of the debtor. Copies of the Motor Vehicle Retail Installment Contract and Certificate of Title are annexed hereto as Exhibit "A" and made a part hereof.

5. TD Bank, N.A., hereby objects to confirmation of the Debtor's Modified Plan which proposes to surrender the collateral in full satisfaction of TD Bank, N.A.'s claim. The Modified Plan lists the value of the surrendered collateral as \$20,973.00 and the deficiency balance as zero.

6. As stated in TD Bank, N.A.'s Motion of Relief, the net balance due was \$29,898.12 as of May 5, 2025 and the wholesale value of the collateral was \$14,750.00. By either valuation, the lien balance is greater than the value and a deficiency balance is anticipated. Accordingly, TD Bank, N.A., specifically reserves the right to file an unsecured deficiency claim.

WHEREFORE, TD Bank, N.A., respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Modified Plan for the reasons hereinabove set forth unless modified to reflect the proper treatment of its claim as detailed above and for such other and further relief as to the Court may seem just and proper.

/s/ Courtney R Shed  
Courtney R Shed, Esq.